

**PROGRAMMATIC ENVIRONMENTAL ASSESSMENT FOR THE  
ELY DISTRICT MANAGED NATURAL AND PRESCRIBED FIRE PLAN  
EA NV-040-00-020**



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**ENVIRONMENTAL ASSESSMENT FOR MANAGED NATURAL FIRE AND  
PROGRAMMATIC ANALYSIS FOR PRESCRIBED FIRE FOR THE  
ELY DISTRICT  
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**I. BACKGROUND INFORMATION**

This Environmental Assessment (EA)/Programmatic Analysis examines the effects of managed natural and prescribed fires as proposed in the Ely District Managed Natural and Prescribed Fire Plan (MN&PF Plan). To fully understand the proposed action and analysis of impacts it is necessary to read both documents. Managed natural and prescribed fires are being addressed in the same environmental document because the impacts are similar. This document will serve as the site-specific analysis for implementation of managed natural fire, and if supported by the analysis, a Decision Record and Finding of No Significant Impact (DR/FONSI) will be issued for managed natural fires. This document will also serve as a programmatic analysis for prescribed fire. A site-specific EA will be written for each prescribed fire, incorporating this document by reference. A separate DR/FONSI will then be prepared for each prescribed fire.

**A. Need for the Proposal**

Concern with the health of the ecosystem and the effects of fire on the ecosystem led the federal government to review its fire management policy. The Federal Wildland Fire Management Policy and Program Review, dated 1995, concluded, "Catastrophic wildfire now threatens millions of wildland acres, particularly where vegetation patterns have been altered by past land-use practices and a century of fire suppression." In addition it states, "Wildland fire, as a critical natural process, must be re-introduced into the ecosystem." and "Every area with burnable vegetation will have an approved Fire Management Plan." The MN&PF Plan is needed to comply with national policy and to improve the health of the ecosystem in the Ely District.

**B. Relationship to Planning**

The MN&PF Plan is in conformance with, and would implement approved decisions from: the Caliente Management Framework Plan (MFP), 1981; the Schell Resource Area MFP, 1983; and the Egan Resource Management Plan (RMP) 1987. The Caliente Resource Area became a part of the Ely District in 1996. The Caliente MFP Step 3 Decision R-6.1 states, "Develop a comprehensive fire management plan for the entire planning unit based on vegetative type, ecological relationships, the effect of different suppression techniques, and human use patterns." The Schell MFP Step 3 Decision FR-1.1 states, "Develop a Fire Management Plan for the Resource Area that would identify where initial attack and subsequent suppression would be actively pursued and areas where fire suppression would be modified, dependent on resource objectives, fuel, and weather conditions." The Record of Decision (ROD) for the Egan RMP states, "A resource area-wide fire management plan will be developed which allows a broad

spectrum of uses. Fire would be used as a tool when it is the most effective and efficient method for improving habitat and increasing available forage.”

The MN&PF Plan would also implement specific management goals identified in various activity plans such as allotment management plans/evaluations, habitat management plans, elk management plans, and the District Fire Management Plan (1998).

The MN&PF Plan is consistent with the Lincoln County Policy Plan for Public Lands (December 5, 1984), the White Pine County Policy Plan for Private and Public Lands (March 18, 1998), and the Nye County Policy Plan for Public Lands (April 3, 1985). The proposed plan would assist in meeting the Standards developed by the Mojave-Southern Great Basin and Northeastern Great Basin Resource Advisory Councils. Specifically, the Mojave-Southern Great Basin Guideline 3.8 states, “Vegetation manipulation treatments may be implemented to improve native plant communities, consistent with appropriate land use plans, in areas where identified Standards cannot be achieved through proper grazing management practices alone. Fire is the preferred vegetation manipulation practice on areas historically adapted to fire; treatment of native vegetation with herbicides or through mechanical means will be used only when other management techniques are not effective.” The Northeastern Great Basin Guideline 3.4 states, “Where grazing practices alone are not likely to achieve habitat objectives, land treatments may be designed and implemented as appropriate.”

### **C. Major Issues**

No major issues which impact the human environment have been identified. Resources which may be impacted are listed in Section III of the MN&PF Plan.

## **II. DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVE**

### **A. Proposed Action**

The proposed action is to implement the MN&PF Plan (see Plan for details). The short-term goal is to re-introduce fire using managed natural and prescribed fire. Natural fires would be managed based on constraints identified in the plan. More prescribed fires would be implemented than occurred in the past. The long-term goal is to allow fire to resume a more natural ecological role within the plan area. In addition, another long-term goal is to reduce fire suppression costs and acres requiring rehabilitation. The life of the plan is 20 years. This plan encompasses 3.6 million acres of the 11.7 million acres of public land within the Ely District (Figure 1 of the MN&PF Plan).

The proposed action would reduce fuel loads on approximately 1,250,000 acres (35% of the proposed plan area, or approximately 10% of the land managed by the Ely District) of various vegetative communities (section II.B. MN&PF Plan) through managed natural and prescribed

fires.

Following a fire report, the fire management staff would make a determination of the fire location. If the reported fire is within the plan area, the staff would evaluate the fire's potential to meet management objectives. They would consider current fire behavior, intensity, and expected growth. After a natural ignition, a team of resource specialists would prepare a Wildland Fire Implementation Plan (Appendix G of the MN&PF Plan) to determine appropriate actions to be taken for each managed natural fire. This process would minimize impacts to resources in the anticipated burn area.

Before a prescribed fire, an interdisciplinary team would conduct site-specific NEPA analysis which would address impacts, and a prescribed fire plan (Appendix H of the MN&PF Plan) would be completed.

Standard Operating Procedures (SOPs) are listed in Appendix F of the MN&PF Plan. Monitoring is discussed in detail in Section VI of the MN&PF Plan. It is anticipated that with the implementation of the MN&PF Plan there would be fewer large, hot fires and more small fires that are less intense.

## **B. No Action**

The no action alternative is to not implement the MN&PF Plan and continue full suppression on all wildland fires. Prescribed fires would continue to be used on a limited basis, but more than in previous years. The Standard Operating Procedures in Appendix F of the MN&PF Plan would apply. Rehabilitation would continue to be considered for fires over 50 acres in size. It is anticipated that without the implementation of this plan the present trend toward more large, hot fires would continue.

## **C. Other Alternatives**

No other alternatives are necessary to respond to unresolved conflicts concerning alternative uses of available resources.

## **III. DESCRIPTION OF THE AFFECTED ENVIRONMENT**

A description of the affected environment can be found in the Ely District land use plans (Caliente MFP, Schell MFP, and Egan RMP) and the associated environmental statements. A detailed description of the resources in the plan area is found in Section I.C. of the MN&PF Plan.

Site-specific descriptions of portions of the affected environment are included, as needed, in the Environmental Consequences section of this EA to facilitate understanding of anticipated impacts.

## **IV. ENVIRONMENTAL CONSEQUENCES**

The following critical elements of the human environment are either not present or are not affected by the proposed action or alternative: Prime or unique farmlands, flood plains, Areas of Critical Environmental Concern (ACEC), wild and scenic rivers, drinking water, environmental justice, paleontological resources, and hazardous and solid wastes.

During development of the MN&PF Plan, fire management polygons were delineated and allowable burned acres were identified to minimize impacts to a variety of resources (see section V.A. in MN&PF Plan). In addition, impacts would be lessened because of the locations and conditions under which fire would be allowed to burn.

For purposes of this analysis the impacts of managed natural and prescribed fire are the same unless otherwise noted. The short-term is less than five (5) years and the long-term is more than twenty (20) years.

### **A. Impact Analysis**

#### **Fire Behavior**

##### Proposed Action

Fire would be re-introduced as a natural component of the ecosystem and would be allowed to function as nearly as possible as an ecological process in a healthy ecosystem. Fires would be less intense in the short- and long-term. The reasons for this are discussed in section V.B.2. of the MN&PF Plan. In the short- and long-term there would be more prescribed fires planned and implemented as described in V.C.2. of the MN&PF Plan.

There would be more natural and prescribed fires which would reduce fuel loading and continuity within the various vegetation communities. This would result in smaller fires in the long-term.

##### No Action

Continued full suppression would limit the role of fire as a natural component of the ecosystem. Fires would escalate in intensity and size due to increased fuel loading and fuel continuity. The current trend toward larger and hotter fires would be expected to continue (Table 1).

Table 1. Ely District Fire History

<b>Years</b>	<b>Number of Fires</b>	<b>BLM Acres Burned</b>	<b>Number of Fires Between 1,000 - 5,000 Acres</b>	<b>Number of Fires Greater than 5,000 Acres</b>
1985-1989	928	38,634	8	1
1990-1994	806	91,806	10	3
1995-1999	1,074	128,201	16	8
2000 (single year)	271	33,935	5	2
<b>Total</b>	<b>3,078</b>	<b>292,576</b>	<b>39</b>	<b>14</b>

## **Fire Management**

### Proposed Action

The fire management staff would use the process described in Section V.B.2. of the MN&PF Plan to decide if the desired conditions are met for a managed natural fire. The proposed action would improve public and firefighter safety, reduce costs of fire suppression, and reduce the burned acres requiring rehabilitation. Firefighter safety would be improved during managed natural fires because the need for direct attack fire suppression actions would be reduced. Natural and man-made barriers, such as ridge tops and roads, would be used to control fires reducing the need for constructed fire lines. This would also reduce the costs of fire suppression. In the long-term, there would be less need for national resources (i.e., air tankers and overhead teams) because fires would generally be smaller, and less intense. National resources would be available for higher priority fires.

Under the proposed action fewer burned acres would require rehabilitation because managed natural fires would be less intense. In the long-term as plant diversity improves in the different vegetation communities, natural rehabilitation would more readily occur, reducing the need to seed burned areas.

### No Action

Managed natural fire would not occur. Firefighting would be more dangerous because more fires would require direct attack fire suppression actions (handlines, dozer lines, engine crews) and less use of natural and existing man-made barriers. Public safety would be at a greater risk due to larger, faster moving fires. The costs of suppressing such fires would continue to increase. There would be a need for more national resources (i.e., air tankers and overhead teams) that could be used for higher priority fires. Higher intensity fires damage or kill more vegetation, therefore, more burned acres would require rehabilitation.

## **Air Quality**

### Proposed Action

There are no non-attainment areas within the Ely District as explained in the Clean Air Act, Section 176(c). Within and adjacent to the plan area are numerous sensitive receptors, such as communities (i.e., Caliente, Ely, Panaca, and Pioche), highway corridors (i.e., U.S. Highways 6, 50, and 93, and State Highway 318), and recreation areas. For managed natural and prescribed fire, impacts to air quality would be taken into account in accordance with Appendix G and Appendix H of the MN&PF Plan.

There would be some short-term impacts to air quality resulting from smoke which may last from several hours to several days. In brush and grass vegetation types, smoke would dissipate rapidly and should be gone shortly after the fire. In pinyon-juniper, curlleaf mountain mahogany, ponderosa pine, and mixed conifer communities, there would be some residual smoke for approximately one to five days after active burning. Unforeseen weather changes may carry the smoke toward sensitive receptors such as communities, residences, highway corridors, and recreation areas. There would be a reduction of total smoke emissions because of smaller less intense fires resulting from reduced fuel loading in the long-term. This would result in less degradation of air quality.

### No Action

Short-term impacts would be similar to those described above. Continued suppression of all fires would lead to further accumulation of fuels in the long-term, increasing the chance of more large, hot fires. The amount of smoke produced by uncontrolled wildland fires would exceed that produced by managed and prescribed fires. The chance of sensitive receptors also being impacted would increase. In the long-term there would be greater degradation of air quality.

## **Soils**

### Proposed Action

Appendix A of the MN&PF Plan provides a description of the affected environment and impacts on soils. The short-term impacts would vary depending on the soil type, soil moisture conditions, and fire severity. Vegetation and microbiotic crust would be removed during a fire resulting in the potential for increased runoff and soil erosion. Soil temperature would increase during a fire. The effects of soil heating would vary according to how hot the fire burns. Soil heating impacts would be the greatest in vegetation types where there is a heavy duff buildup. This can be found in the mixed conifer, curlleaf mountain mahogany, closed-canopy pinyon-juniper, and mountain brush communities. As a result of heating the soil, chemical and physical changes occur. Nitrogen fixation would be temporarily reduced. Some available nitrogen would be volatilized or bound up during root decomposition of dead plants. This would be offset by

nutrient release from burned vegetation.

After a fire, the presence of burned organic material or ash on the surface would cause solar heating of the soil to be faster than vegetated or bare soil. Heating stimulates vegetative growth, particularly with sufficient moisture. Heating would also desiccate the soil surface. Burns could cause reduced infiltration, and increased carbon, potassium, phosphorus, and nitrogen levels in the soil during the first year. Runoff could carry some of these nutrients off-site.

Soil characteristics would improve in the long-term. Because future fires would be smaller and less intense, there would be less heating of the soil, chemical changes would not be as great and vegetation would re-establish sooner and at a higher density. Surface area of cryptogamic crusts would increase. Infiltration would improve resulting in reduced runoff.

The greatest potential impact would be the loss of soil productivity through erosion. This would occur under certain conditions such as short duration high intensity thunderstorms and sudden snow-melt runoff. Smaller, less intense fires over the long-term would lessen erosion potential. Following the re-establishment of herbaceous vegetation, wind and water erosion would be reduced.

#### No Action

Short-term effects of fire on soils are similar to those discussed above except erosion potential would be higher than in the proposed action. Because wildland fires would be larger and burn hotter under the no action alternative the re-establishment of vegetation would take longer. This would result in a potential increase in soil erosion.

### **Water Quality and Quantity**

#### Proposed Action

Immediately after any fire, surface runoff would increase because of the loss of vegetation and surface litter. Intermittent and perennial streams would experience greater peak flows. Overland flows would increase for one or two years after the fire, or until the vegetation re-established. In the long-term, there would be an increase in infiltration because of the increase in herbaceous cover resulting in a reduction of overland flow. Intermittent streams would flow for a longer period. Perennial streams and springs within affected watersheds would increase in flow.

High intensity thunderstorms and/or rapid snow-melt may cause water quality in the burned watershed to deteriorate. This could result in reduced oxygen levels due to increased sediment load. This condition would last until vegetation recovers, usually within one to two years after a fire. In the short- and long-term water quality would improve due to decreased sediment loading because fires would be smaller and less intense.

## No Action

In the short- and long-term surface runoff would increase more than under the proposed action because the fires would be larger, thus there would be more continuous areas without vegetation. The increase in runoff would last longer because rehabilitation would not occur as quickly after these hotter fires.

Short-term impacts to water quality would be similar to those discussed in the proposed action. Water quality would deteriorate in the long-term due to more large, hot fires.

## **Vegetation**

### Proposed Action

Fire is an integral and important naturally occurring ecological process within many of the Great Basin's vegetative communities (Appendix B of the MN&PF Plan). Wildland fire, started either by natural processes or by native peoples, has been a major element in the development of ecosystems in the western United States. Many of the vegetation communities developed under a regime of intermittent fire, and are adapted in some way to fire. The historic (natural) fire regimes ranged from cooler surface fires to infrequent canopy fires. Normal fire return intervals by vegetation communities within the plan area are shown in Table 1 of the MN&PF Plan.

Managed natural and prescribed fires would burn under conditions where fire would be less intense (i.e. higher soil and fuel moisture, higher relative humidity, and lower temperatures). Native vegetation would re-establish and the need for rehabilitation would be less than present levels. Vegetation communities would be converted to an earlier successional stage, stimulating new growth. In the long-term, total plant productivity would increase.

In sagebrush communities, the density and canopy cover of sagebrush would be reduced. Herbaceous species such as bluebunch wheatgrass, bottlebrush squirreltail, Indian ricegrass, basin wildrye, Sandberg bluegrass, muttongrass, Nevada bluegrass, and Canby bluegrass would increase in density and production. In addition, perennial forbs would also increase. Encroachment of pinyon and juniper into sagebrush communities would be reduced.

In pinyon-juniper communities, decadent stands of trees would be opened allowing for regeneration of grasses, forbs, shrubs, and young trees. This would increase plant diversity and age classes over the entire area.

In the mountain brush communities, certain species of shrubs resprout vigorously after fire. Serviceberry, snowberry, and ribes species would increase in the northern mountain brush community, while desert bitterbrush, Gambel oak, and Turbinella oak would increase in the southern mountain brush community. Resprout of antelope bitterbrush, an important wildlife browse species in the northern brush community, depends on soil moisture and fire intensity. Decreased fire intensity under this alternative would allow antelope bitterbrush to resprout.

Aspen communities which are dependent on fire for regeneration, would be enhanced. Burning these communities would allow for more young aspen suckers to sprout resulting in a more diverse age class of trees.

Fuel loading and fuel continuity would be reduced in mixed conifer communities. This would reduce the chance of large, stand-replacing fires. Species composition would increase. Overall forest health of mixed conifer communities would improve.

In the long-term, there would be a mosaic of vegetative communities which would result in fires being smaller and less intense.

#### No Action

In the short-term large hot fires would kill grasses, forbs and shrubs reducing the chance for natural rehabilitation compared to the proposed action. The need for seeding burned areas would continue to increase.

Fuel loading would continue to increase within the different vegetation communities. Density and canopy cover of sagebrush, mountain brush species, pinyon and juniper trees would continue to increase. Herbaceous vegetation (i.e. grasses and forbs) would decrease. Aspen communities would continue to be replaced by mixed conifers. Litter and ladder fuels would continue to build-up in mixed conifer stands. This increase in fuel loading would lead to more large hot fires and a reduction in the mosaic of vegetative communities throughout the entire plan area.

#### **Noxious and Invasive Weeds**

##### Proposed Action

There would be little risk that noxious weeds would increase because known areas of noxious weed occurrence were specifically excluded from the fire management polygons. The lack of proximity to seed source would minimize the establishment and spread of noxious weeds. Invasive species, such as cheatgrass, are found within the plan area. The proximity of their seed source could facilitate the spread of these invasive species, depending on the health of the understory vegetation prior to the fire.

The Managed Fire Implementation Team (MFIT) or the site-specific EA for each prescribed fire would consider the potential for the spread of noxious and invasive weeds. For managed natural fires the MFIT would determine what appropriate management response would be implemented.

The risk of weed introduction would be reduced after fire with the re-establishment of perennial grasses, forbs, and shrubs creating an environment where noxious and invasive weeds would be less competitive. This would reduce the potential for the spread of noxious and invasive weeds into the burned areas over the long-term.

### No Action

In the short-term, the risks of noxious weed increase would be the same as in the proposed action. Invasive species, in the short-term could increase due to more large, hot fires. Cheatgrass would be more likely to become established or expand its range. This would potentially increase fire frequency and size due to the flammability of cheatgrass. There would be continued escalation and expansion of the annual grass re-burn phenomenon (The Great Basin: Healing the Land, Bureau of Land Management, April 2000).

The impacts from prescribed fires would be the same as in the proposed action because the site specific potential for the spread of noxious and invasive weeds would be considered in the EA for each prescribed fire.

In the long-term the frequency of large, hot fires would continue to increase. Larger burned areas and fewer unburned islands within the burn would lead to longer recovery periods following the fire. Natural regeneration processes for species which do not resprout after a fire would take longer due to the size of the burned area. This would decrease the edge effect for airborne seed establishment of native vegetation and result in longer periods of vulnerability to noxious and invasive species. This would increase the potential for the spread of noxious and invasive weeds into the burned areas over the long-term.

### **Riparian Areas/Wetlands**

#### Proposed Action

There would be a temporary deterioration of lentic and lotic riparian areas and wetlands because of the loss of vegetation and the increase in sediment load. The vegetation should grow back quickly. With increased water flows (see Water Quality/Quantity section), these riparian areas should expand under the proposed action. Prescribed fires can be used as a tool to meet proper functioning conditions at riparian areas that have been encroached by upland species (i.e, pinyon, juniper, and sagebrush).

#### No Action

Impacts to lentic riparian areas would be similar to those in the proposed action in the short- and long-term. Lotic riparian areas would deteriorate in the long-term because of increased stream bank erosion and headcutting. This is the result of a larger area being intensely burned in the affected watershed. Prescribed fires could still be used as a tool to meet proper functioning conditions at riparian areas.

### **Special Status Species (Threatened, Endangered and Sensitive Species)**

#### Proposed Action

Federally designated threatened and endangered species (Appendix C of the MN&PF Plan) or critical habitat would not be impacted by use of managed natural and prescribed fires. These impacts would be avoided because of the screening which has already been completed for

identification of the polygons that make up the plan area, and the pre-planning which would be conducted prior to any managed natural fire or prescribed fire.

Nevada BLM sensitive species (Appendix C of the MN&PF Plan) could be impacted by the proposed action. Impacts would be minimal because any sensitive species would be identified and protected during the planning of managed natural and prescribed fires. This planning would include considerations such as potential impacts to habitats for special status species. Individual plants and animals could be lost in a fire, but this would not affect the local population or the species in the long-term. Immediately after any fire, there could be a loss of habitat for sensitive animal species. The species would be displaced until the habitat is restored.

Sage grouse, a Nevada BLM sensitive species, are found throughout the MN&PF Plan area. Screening of the polygons has resulted in fewer than 12 known leks (less than 6 percent of the total leks in the District) being located within the plan area. In addition, the plan area includes nesting, brooding, and summer habitat for sage grouse. Generally, they prefer open sagebrush stands with an understory of perennial grasses and forbs as well as riparian areas.

The management objectives of the MN&PF Plan is to burn 35 percent of sagebrush communities within the plan area over the life of the plan. This is approximately 15 percent of the sagebrush community within the entire Ely District. This would increase plant diversity and would result in differing age classes of sagebrush. This would benefit sage grouse in the long-term. Burning would be done in accordance with the Draft Management Guidelines for the Greater Sage Grouse and Sagebrush-Steppe Ecosystems for BLM-Administered Lands in Nevada. In addition, sage grouse would benefit from expansion of riparian areas (Riparian Areas/Wetlands section).

#### No Action

The chance of impacting federally designated threatened and endangered species and Nevada BLM sensitive species (Appendix C in MN&PF Plan) or habitat could be increased because of the potential for more large uncontrolled wildland fires in the short- and long-term.

Prescribed burning would be used on a limited basis to improve sage grouse habitat over the long-term. This would increase plant diversity and would result in differing age classes of sagebrush. Burning would be done in accordance with the Draft Management Guidelines for the Greater Sage Grouse and Sagebrush-Steppe Ecosystems for BLM-Administered Lands in Nevada. Sage grouse would benefit from expansion of riparian areas but to a lesser extent, than under the proposed action.

#### **Wildlife**

##### Proposed Action

Boundaries of polygons within the plan area were identified and allowable burned acres within each polygon were specified to reduce potential impacts to wildlife (Table 6 of the MN&PF Plan). In most cases, animals would be able to escape managed natural and prescribed fires.

However, some individuals could perish. There would be direct and indirect impacts on resident wildlife because of the loss of vegetative cover within the burned area. This impact would be minimal because wildlife would move into adjacent unburned areas.

In the long-term, wildlife habitat conditions would improve as a result of managed natural and prescribed fires. The increase in understory vegetation (i.e., perennial grasses and forbs), and the increase in species diversity on burned areas would benefit most species of wildlife. Decreased fire intensity under this alternative would allow more antelope bitterbrush, an important wildlife browse species, to resprout. Over a large area, the mosaic of different vegetation communities and age-class structures within those communities, would provide a variety of habitats for wildlife. The distribution of wildlife species would shift accordingly.

Appendix D of the MN&PF Plan shows the obligate and dependent bird species for various habitat types in the plan area. In the short-term, habitat for these species would be burned; however, there is abundant unburned habitat available nearby. Individual birds could relocate. Because fires would be smaller in the long-term, there would be less impacts to local bird populations.

#### No Action

In most cases, animals would be able to escape wildland fires. However, some individuals could perish. There would be direct and indirect impacts on resident wildlife because of the loss of vegetative cover within the burned area. These impacts would increase under this alternative because there would be more large, hot fires due to continued build-up of fuels.

The long-term benefits to wildlife habitat as described under the proposed action would not occur. The vegetative response after most large, hot fires is a decrease in perennial grasses, forbs, and shrubs. The mosaic created under the proposed action would not be realized.

In the short-term, habitat for obligate and dependent bird species would be burned. There would be unburned habitat available nearby. In the long-term, habitat for these species would deteriorate to a greater extent than under the proposed action (see Vegetation section above). Because fires would burn larger blocks of contiguous habitat, local bird populations would have more difficulty relocating.

### **Wild Horses**

#### Proposed Action

Direct and indirect impacts to wild horses would be minimized because of the pre-planning which would be conducted prior to any managed natural fire (Appendix G in MN&PF Plan) or during the preparation of an EA for each prescribed fire. Wild horses would be temporarily displaced. In the long-term wild horse habitat conditions would be improved (see Vegetation, Water Quantity and Quality, and Wildlife sections above).

## No Action

Wild horses would be temporarily displaced. In the long-term wild horse habitat conditions would continue to deteriorate because of more large, hot fires (see Vegetation section above).

## **Livestock Grazing**

### Proposed Action

The Managed Fire Implementation Team (MFIT) or the site-specific EA for each prescribed fire would consider the potential for damage to range improvements (i.e., corrals, fences, pipelines). Damage to range improvements on a managed natural fire could impact the livestock permittee. Rebuilding these projects would take time and money.

There would be a short-term impact to livestock grazing. Livestock would be restricted from the burn area until resource management objectives have been met (Appendix F of the MN&PF Plan). Subsequent to a managed natural fire, the livestock permittee could work with the BLM to find other potential grazing areas and/or alternative methods (i.e., fencing, herding, watering) to keep livestock off the burned areas.

The majority of fires within the Ely District occur in the pinyon-juniper vegetation communities, and where pinyon and juniper trees are encroaching into the sagebrush and mountain brush communities. Currently these communities produce very little forage for livestock grazing because of the dense overstory of trees and shrubs. After a fire there would be an increase in understory vegetation (i.e., perennial grasses and forbs) resulting in additional forage. This forage could be available to livestock as well as wildlife and wild horses.

## No Action

The site-specific EA for each prescribed fire would consider the potential for damage to range improvements (i.e., corrals, fences, pipelines). More range improvements could be damaged or destroyed from uncontrolled wildland fires and need to be replaced.

Impacts to livestock grazing in the short-term would be greater due to the anticipated increase in more large, hot fires. Livestock would be restricted from the burn area until resource management objectives have been met. Larger areas would have to be rested from grazing and likely for a longer period of time to allow the vegetation to recover after these fires.

In the long-term livestock forage conditions would continue to deteriorate because of more large, hot fires (see Vegetation section above).

## **Cultural Resources**

### Proposed Action

Appendix E of the MN&PF Plan describes fire effects on cultural resources. The MFIT or the

team assigned to each prescribed burn would obtain recommendations from an archeologist to reduce potential for damage to cultural resources. Impacts would be lessened because of smaller, less intense, managed natural and prescribed fires. Ground disturbing activities (e.g., bulldozers, handlines and cross country vehicle travel during wildfire events) which could result in the destruction of cultural resources would be less necessary under this alternative (see Fire Management section above). Post-fire effects resulting from erosion would be reduced because of smaller, less intense fires (see Soils section above).

During the life of the plan, an unknown number of additional archeological resources and historic properties may be identified and protected from damage or destruction. This would result in a greater number of archeological and historical resources added to the database within the Ely District and an increased knowledge of locations and types of cultural resources.

#### No Action

Because there would be more uncontrolled large, hot fires more archeological resources and historic properties would be damaged or destroyed over the long-term. Impacts within each prescribed burn would be the same as described for the proposed action. More ground disturbing activities associated with suppression of uncontrolled wildland fires would result in damage or destruction of cultural resources. Post-fire effects resulting from erosion would be increased because of more large, hot fires. There would be fewer archeological resources and historic properties added to the database within the Ely District because less acres would be inventoried.

### **Native American Religious Concerns**

#### Proposed Action

No known religious sites have been identified in the plan area. Traditional values and use areas may be impacted by managed natural and prescribed fire. Certain plants, such as pinyon trees, juniper trees, sagebrush and willows used by Native Americans would be burned. The long-term goal of allowing fire to resume a more natural ecological role may be preferable to the Native American communities, based on pasted discussions (Native American Concerns MN&PF Plan).

#### No Action

Traditional values and use areas may be impacted by uncontrolled wildland fire and prescribed fire. While no known religious sites are identified in the plan area, there would be increased impacts to the vegetation (and other natural values) associated with religious sites and traditional values and use areas because there would be more large, hot fires (see Vegetation section above). Continuation of full suppression may be less acceptable to traditional Native American communities because this does not allow fire to resume a more natural ecological role.

## **Recreation**

### Proposed Action

The use of managed natural and prescribed fires would result in displacing dispersed recreation users from the burned areas. Depending on the type of recreational activity, this impact may last up to several years after the fire. Fire near developed recreation sites could affect the quality of a visitor's experience due to smoke. Using prescribed fire to create fire breaks could be beneficial in protecting developed recreation sites. Consumptive (such as hunting) and non-consumptive (such as wildlife viewing) wildlife activities would increase because of the improvement in wildlife habitat resulting from the proposed action (see Wildlife section above). In the long-term, vegetative mosaics from managed natural and prescribed fires could enhance the visitor's experience.

### No Action

The impacts to recreation would be similar to those for the proposed action except that wildlife habitat would not improve to the same degree and there would be an increase risk to the public because of more large, hot fires.

## **Visual Resource Management**

### Proposed Action

The use of managed natural and prescribed fire would result in line, color and texture contrasts. In general, these contrasts would be of small scale associated with the landscape. Line contrasts would result from fingers of burned areas within a landscape of generally small, irregular patches of vegetation, soil and rock outcrops. Natural and man-made barriers such as ridge tops and roads would be used to control fires reducing the need for constructed fire lines. This would reduce the line and color contrasts introduced on the landscape. Fire blackened, dead vegetation interspersed with areas of unaltered, live vegetation would create color contrasts. This would remain noticeable to the casual observer for at least three years. Changes in texture would depend primarily on viewing distance.

As the revegetation of grasses and shrubs occurs, the fire's visual effects could change. This change would add greater visual diversity to the landscape. Visual Resource Management (VRM) classes have been established for the Ely District (VRM section of the MN&PF Plan). VRM Class I objectives would be met because the action would preserve the existing character of the landscape by allowing for natural ecological change.

### No Action

In the long-term there would be a need for more ground disturbing fire suppression activities resulting in line and color contrasts. Impacts would be similar to those described in the proposed action except that more large, hot fires would create larger scale contrasts in the landscape. VRM Class I objectives would be met because the standard operating procedures for "Light-hand

on the Land” fire suppression methods would preserve the existing character of the landscape.

## **Wilderness Values**

### Proposed Action

There are portions of sixteen wilderness study areas (WSAs), and one instant study area (ISA) (**Hereafter referred to collectively as “WSAs”**) and one wilderness designated within the plan area (Figure 2 of the MN&PF Plan). Fire suppression within wilderness and WSAs will be in accordance with the approved wilderness management plan and the Interim Management Policy for Lands Under Wilderness Review, respectively. Table 5 Wilderness Areas and Table 4 Wilderness Study Areas of the MN&PF Plan lists acreage within the plan area. Fires within wilderness and WSAs would be evaluated regarding the potential for fires to maintain wilderness values (i.e. solitude, naturalness, primitive and unconfined recreation).

Removal of visual screening provided by tree cover would make it more difficult for wilderness visitors to avoid the sights, sounds, and the evidence of other visitors (i.e. solitude) within the wilderness or WSA. The magnitude of this impact would depend on the size and location of the fire, and the vegetative community burned.

In the long-term use of managed natural and prescribed fires would help maintain the plant diversity in fire-dependent ecosystems in wilderness and WSAs. This would enhance the naturalness of these areas through the restoration of native plant communities and normal (historic) fire return intervals (Table 1 of the MN&PF Plan). If rehabilitation is necessary after a managed natural fire, only native seed will be used in WSAs in accordance with the Interim Management Policy for Lands Under Wilderness Review. Managed natural and prescribed fires would also increase vegetative mosaics and reduce fuel loading and continuity. The effects of fire within a wilderness area or WSA may be visually evident for decades.

Primitive and unconfined types of recreational use may be affected within burned areas. In the short-term visitors may avoid a burned area. Visitors may be attracted to burned areas as re-vegetation occurs.

### No Action

Fire suppression within wilderness and WSAs will be in accordance with the approved wilderness management plan and the Interim Management Policy for Lands Under Wilderness Review, respectively. Because full suppression would be used on all fires within wilderness and WSAs, there would be a continuation of fuel build-ups which would result in more large, hot fires. The short-term impacts would be similar to those described in the proposed action.

The long-term impacts on wilderness values as described under the proposed action, would not occur. The longer that fire is absent from these areas, the greater the potential for stand replacing fires within the woodland communities. This could reduce wilderness values (i.e., solitude, naturalness, primitive and unconfined recreation) for some users.

## **Mining**

### Proposed Action

Mining claim posts would be burned in a managed natural fire. These claims would then need to be restaked and/or resurveyed. This would be an economic burden on the claimant. It is also possible, but less likely, that claim posts would be burned in a prescribed fire. Affected mine claimants will be identified and notified prior to implementation of prescribed fires. There would be no impacts to mining facilities and operations.

### No Action

Impacts would be similar to those described in the proposed action.

## **Woodland Products**

### Proposed Action

Woodland products that are harvested for personal and commercial use include firewood, pine nuts, fenceposts, and Christmas trees. The impacts on the availability of these woodland products would be inconsequential. The supply of these products, except for pine nuts, exceeds demand. The pinyon-juniper woodland contains an estimated 20 million cords of firewood within the District, while firewood permits sold throughout the District total less than 5,000 cords per year. Pine nut production is a function of climatic conditions, which are beyond the scope of this document.

### No Action

The impacts would be similar to the proposed action.

## **B. Cumulative Impacts**

According to BLM handbook Guidelines For Assessing and Documenting Cumulative Impacts (1994), the amount of analysis that is necessary can be greatly reduced by limiting cumulative analysis only to those issues and resource values identified during scoping that are of major importance. The resource values of major importance which will be analyzed are: 1) re-introduction of wildland fire into the ecosystem, and 2) vegetation health (i.e. cover and composition) in the plan area.

### **Past actions**

Past land use practices have altered vegetation communities. Livestock grazing has occurred in the plan area since the mid 1800s with an increase in intensity until the 1930s. This resulted in a decrease of grasses and forbs and an increase in shrubs and trees. The change in vegetation increased the frequency of large, stand replacing fires.

Woodland products were extensively harvested throughout eastern Nevada in the late 19<sup>th</sup> century for the mining industry. These practices removed the trees and reduced fuel loading within these vegetation communities. Since 1900 pinyon and juniper trees have re-established on these sites and expanded into adjacent vegetation communities.

Beginning in the 1930s the federal government started managing public lands which included fire suppression. BLM placed more emphasis on suppressing fires. As a consequence, vegetation cover and composition changed. Shrub and tree densities increased as well as canopy cover. Grasses and forbs decreased as a result of competition for light, space and nutrients. Vegetation communities became less diverse and more even-aged. Woody species (i.e., shrubs and trees) increased fuel loading which resulted in more large, hot fires.

Human caused climatic change has also altered vegetation cover and composition. Increases in carbon dioxide levels have been detected globally. Research has shown higher carbon dioxide levels favor the growth of woody species as well as some invasive weeds.

In the past 40 years, approximately 274,000 acres of vegetation conversion projects have been completed in the Ely District, most of which occurred in the plan area. These projects were designed to reduce the cover of sagebrush or pinyon and juniper trees, and increase the herbaceous vegetation through seeding grasses and forbs. Trees and shrubs have re-established in many of these sites. Prescribed fire was the primary method used to maintain these projects. In the past prescribed fire was also used on a limited basis to enhance riparian areas.

### **Present actions**

The trend toward more large, hot fires continued in 2000 (see Table 1). Current fire management practices and policies perpetuate fuel loading.

Current land management is focused on improving vegetative condition within the plan area. Permitted use by livestock and appropriate management levels for wild horses are being established. Vegetation conversion projects (e.g., mechanical treatments and prescribed fire) are being implemented to create openings within even-aged stands of shrubs and trees. Efforts to inventory and minimize the spread of noxious and invasive weeds are continuing.

### **Reasonably foreseeable future actions**

It is anticipated that the number of natural fire ignitions will be similar to previous years. Prescribed fires will continue to be used on a limited basis.

Livestock grazing will continue to be managed to meet Resource Advisory Council Standards. Wild horses will be managed at appropriate levels. Wilderness designations within the plan area will occur. Wilderness management plans will be written which will consider fire management. Urban interface will continue to be a concern in the management of fires within the plan area. Efforts to detect and control noxious and invasive weeds will increase.

The Great Basin Restoration Initiative has been proposed to restore vegetation communities in this ecosystem. In the Ely District this would be implemented as the Eastern Nevada Landscape Restoration Project which would provide the funding to implement approved activity plans (e.g., Fire Management Plans, Allotment Management Plans, Elk Management Plans, Habitat Management Plans). In the foreseeable future, approximately 100,000 acres within the Ely District are being proposed for treatment annually to improve the health of vegetation communities.

## **Conclusion-Cumulative effects**

### Proposed Action

Managed natural and prescribed fire would be used, as one of several methods, to reduce fuel build-up within the plan area. Acres burned under the MN&PF Plan would contribute to the 100,000 acres being proposed for treatment annually within the Ely District. The cumulative impact would be a mosaic of vegetation communities throughout the plan area allowing fire to resume a more natural role in the ecosystem.

### No Action

Managed natural fires would not occur, therefore substantially less than 100,000 acres would be treated annually. There would be an increase in fuel loading which would lead to more large, hot fires and a reduction in the mosaic of vegetative communities throughout the entire plan area. Fire would not be allowed to resume a more natural role in the ecosystem.

## **V. PROPOSED MITIGATING MEASURES**

Mitigating measures to minimize impacts are part of the proposed action and are included in the Standard Operating Procedures (Appendix F of the MN&PF Plan). No additional mitigation is proposed in response to anticipated impacts.

## **VI. SUGGESTED MONITORING**

The Ely District Managed Natural and Prescribed Fire Plan establishes monitoring procedures and reporting requirements for fire, vegetation, watershed, and human resource management objectives. These procedures can be found in Section VI of the MN&PF Plan. No additional monitoring is suggested as a result of the analysis of anticipated impacts.

## **VII. CONSULTATION AND COORDINATION**

### Intensity of Public Interest and Record of Contacts

In 1995, the Ely District began to implement the Federal Wildland Fire Management Policy and

Program Review. A technical review team (TRT) was formed to prepare a fire management plan which would allow fire to resume a more natural ecological role for all lands within the Ely District. The Ely District Fire Management Plan was approved in August 1998, and an environmental assessment analyzing the impacts of managed wildland fires within the Snake Mountain Range was prepared in October 1998. It was determined that the scoping done for these two documents was adequate in identifying issues pertaining to the proposed action in the Programmatic Environmental Assessment for the Ely District Managed Natural and Prescribed Fire Plan.

Appendix 1 lists all representatives from American Indian Tribal governments, state agencies, local government entities, and affected and interested publics who were notified of the availability of the draft Ely District Managed Natural and Prescribed Fire Plan and the preliminary Environmental Assessment for Managed Natural Fire and Programmatic Analysis for Prescribed Fire for the Ely District. These documents were also posted on the Ely Field Office's Home Page (<http://www.nv.blm.gov/Ely>) for review beginning on May 18, 2000.

Comments were received from the following:

Kraig Beckstrand and Mike Scott, NDOW Southern Region  
Steve Foree, NDOW Eastern Region  
John Hiatt, Audubon Society, Red Rock Chapter  
Kevin Kirkeby, White Pine County Board of County Commissioners  
Jerry Miller, Natural Resources Conservation Service  
Rebecca Palmer, NV State Historic Preservation Officer  
Steve Smith, NSO BLM  
Rose Strickland, Toiyabe Chapter, Sierra Club  
Glenn Terry, Public Land Users Advisory Committee, White Pine County

All respondents generally supported the use of managed natural and prescribed fire in the Ely District. Extensive written comments regarding plan implementation and the NEPA analysis were received from the Audubon Society and the Sierra Club. These comments and the BLM's responses are included in Appendix 2.

#### Internal District Review

Mark Barber	Riparian Areas and Special Status Species
Lynn Bjorklund	Minerals
Shane DeForest	Noxious Weeds and Wild Horses
Gene Drais	Assistant Field Manager-Nonrenewable Resources
Bill Dunn	Fire Management Officer
Mark Henderson	Archeology and Historic Preservation
Susan Howle	Environmental Coordination, Recreation, Wilderness and Visual Resource Management
Eric Luse	Associate Field Manager
Mike Main (Team Leader)	Fire Ecology
Gary Medlyn	Soil, Water, Air

Jim Perkins  
Paul Podborny  
Jacob Rajala  
Curtis Tucker  
Matt Wilkin

Assistant Field Manager-Renewable Resources  
Range and Wildlife  
Planning and Environmental Coordination  
Native American Consultation  
Geographic Information Systems (GIS)

**Appendix 1**  
Notifications Sent

Lincoln County Commissioners

Nye County Commissioners

White Pine County Commissioners

State of Nevada, Office of the Attorney General c/o Mr. Wayne Howle

American Horse Protection Association

Animal Protection Institute of America

The Humane Society of the United States

Commission for the Preservation of Wild Horses

National Mustang Association, Inc.

National Wild Horse Association

Wild Horse Organized Assistance c/o Mrs. Dawn Lappin

Nevada Division of Wildlife State Headquarters c/o Mr. Stan Stiver

Nevada Division of Wildlife State Headquarters c/o Mr. Doug Hunt

Nevada Division of Wildlife Eastern Region

Nevada Division of Wildlife Southern Region

Nevada Division of Wildlife c/o Mr. Mike Podborny

Nevada Division of Wildlife c/o Mr. Mike Scott

Nevada Division of Wildlife c/o Mr. Curt Baughman

U. S. Fish and Wildlife Service (Reno)

Nevada State Clearinghouse (Carson City)

Sierra Club, Toiyabe Chapter c/o Ms. Rose Strickland

Sierra Club, Toiyabe Chapter c/o Mr. Glen Miller

Sierra Club, Toiyabe Chapter c/o Ms. Marjorie Sill

Duckwater Tribal Council c/o Mr. Jerry Millet

Moapa Business Council c/o Mr. William Anderson

Te-Moak Tribe of Western Shoshone c/o Ms. Christine Stones

Ely Shoshone Tribe c/o Mr. Authur Kammassee

Goshute Tribal Council c/o Mr. David Pete

The Nevada State Historic Preservation Office c/o Ms. Rebecca Lynn Palmer

The Wilderness Society (Washington DC)

The Wilderness Society CA/NV Regional Director c/o Mr. Jay T. Watson

The Wilderness Society c/o Mr. Norbert Riedy

Friends of Nevada Wilderness c/o Mr. Pat Dingle

Friends of Nevada Wilderness (Las Vegas)

Friends of Nevada Wilderness c/o Mr. Tom Myers

Audubon Society, Red Rock Chapter c/o Mr. John Hiatt

Nevada Outdoor Recreation Association c/o Mr. Charlie Watson

Nevada Wildlife Federation c/o Mr. Gale G. Dupree

Bureau of Land Management Washington Offices Wilderness c/o Mr. Jeff Jarvis

Bureau of Land Management Wilderness c/o Mr. Steve Smith

Department of Conservation and Natural Resources Division of Environmental Protection

Great Basin National Park

USFS Ely Ranger District

Nature Resource Conservation Service c/o Jerry Miller

Ms. Kathryn Ataman Northeastern Great Basin Resource Advisory Council

Mr. Bob Edwards Northeastern Great Basin Resource Advisory Council

Mr. Vince Garcia Northeastern Great Basin Resource Advisory Council

Mr. Robert McGinty Northeastern Great Basin Resource Advisory Council

Mr. Dave Tattam Northeastern Great Basin Resource Advisory Council

Mr. Larry W. Barngrover Northeastern Great Basin Resource Advisory Council

Mr. Scott Egbert Northeastern Great Basin Resource Advisory Council

Dr. Hudson A. Glimp Northeastern Great Basin Resource Advisory Council

Mr. Jon L. Muller Northeastern Great Basin Resource Advisory Council

Ms. Patsy Tomera Northeastern Great Basin Resource Advisory Council

Ms. Teresa A. Conner Northeastern Great Basin Resource Advisory Council

Mr. Brent Eldridge Northeastern Great Basin Resource Advisory Council

Mr. Merlin McColm Northeastern Great Basin Resource Advisory Council

Mr. F. Deloyd Satterthwaite Northeastern Great Basin Resource Advisory Council

Mr. Bill W. Upton Northeastern Great Basin Resource Advisory Council

Ms. Marta Agee Mojave-Southern Great Basin Resource Advisory Council

Mr. Maurice Frank Mojave-Southern Great Basin Resource Advisory Council

Mr. Gary Hollis Mojave-Southern Great Basin Resource Advisory Council

Mr. Steve Mellington Mojave-Southern Great Basin Resource Advisory Council

Mr. Duane L. Whiting Mojave-Southern Great Basin Resource Advisory Council

Ms. Colleen Beck Mojave-Southern Great Basin Resource Advisory Council

Mr. Jerry Helton Mojave-Southern Great Basin Resource Advisory Council

Mr. Alan N. Levinson Mojave-Southern Great Basin Resource Advisory Council

Ms. Susan Selby Mojave-Southern Great Basin Resource Advisory Council

Mr. Mike Wickersham Mojave-Southern Great Basin Resource Advisory Council

Ms. Barbara Callihan Mojave-Southern Great Basin Resource Advisory Council

Mr. Jonh E. Hiatt Mojave-Southern Great Basin Resource Advisory Council

Mr. Robert W. Maichle Mojave-Southern Great Basin Resource Advisory Council

Mr. Stanley Smith Mojave-Southern Great Basin Resource Advisory Council

Keith Gibson

Mr. Glenn Terry

## Appendix 2

Comments received from the Audubon Society, Red Rock Chapter and the Sierra Club, Toiyabe Chapter and the BLM's responses.

From: "Hermi/John Hiatt" <hjhiatt@anv.net> on 07/03/2000 10:26 PM  
GMT  
To: Michael Main/EYFO/NV/BLM/DOI@BLM  
cc:

Document Link Information:

3 July, 2000

Mike Main

Bureau of Land Management

Ely Field Office

Ely, Nevada 89301-9408

RE: 9211 (NV-044)

Dear Sir,

I generally support your plans for fire management as outlined in the "Ely District Managed Natural and Prescribed Fire Plan". I feel strongly that the No Action Alternative would be a serious mistake and an unacceptable course to follow. There are three areas however, that in my opinion are not adequately covered in the document.

The management of fire (both prescribed and natural) in Wilderness Study Areas (WSAs) and future wilderness areas is not dealt with in any detail except to say that the Interim Management Plant (IMP) regulations will be followed. It is my impression that the IMP regulations don't seriously address the issue of prescribed fire as a tool to make amends for many decades of fire suppression. Also, the issue of seeding and fire rehab in WSAs following natural fire events needs to be spelled out. Issues such as seeding with non-native species following a fire event need to be addressed. The IMP regulations prohibit introduction of non-native species but I believe this has happened in the Table Mountain WSA following the 1997 wildfire event.

Second issue of importance is the need for post-fire monitoring of recovery processes. This is absolutely essential since it is imperative to know which management techniques are most effective in any given situation. Study plots need to be large enough (minimum of 10 acres/site) and properly matched with control sites such that valid quantitative data can be obtained.

The Table Mountain fire site is a case in point. That fire presented a wonderful opportunity to gather data about the benefits of post-fire seeding and its long-term usefulness in the rehabilitation process. Yet no significant long-term study sites were established and ten years from now we will only have anecdotal material available about the benefits of the seeding effort. Given the amount of money that will be spent in the next 20 years on fire management and post-fire rehab in the Ely District and throughout the Intermountain west it is of the utmost importance to gather good data about the effects of our actions.

I would strongly recommend that a fulltime botanist be hired to assess and document the results of the various vegetative manipulation schemes which are being proposed to recreate a more Savannah-like landscape such as existed in eastern Nevada prior to 1900. This person needs to be a competent scientist with freedom to conduct research in an independent manner, and to publish the information obtained in peer-reviewed journals.

Lastly, it should be noted that while bristlecone pines are generally a high elevation species there are locations where they are growing in conjunction with and immediately adjacent to pinyon groves. The east side of the Worthington Mountains is a good example where this occurs. Managers need to be aware that species which don't usually co-exist with pinyon-juniper may do so on occasion and that those areas need special considerations in fire management plans.

In conclusion, the major issues which I feel need more emphasis and explanation are fire management in wilderness and wilderness study areas, and the imperative for establishing a strong, science based monitoring system.

Sincerely,

John E. Hiatt

Conservation Chair, Red Rock Audubon Society

- att1.htm
- Ely Fire Plan.doc



# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

Ely Field Office  
HC 33 Box 33500 (702 No. Industrial Way)  
Ely, Nevada 89301-9408  
<http://www.nv.blm.gov/Ely>

In Reply Refer To:  
9211.1 (NV-040)

Mr. John E. Hiatt  
8180 Placid Street  
Las Vegas, Nevada 89123

Dear Mr. Hiatt:

This letter is in response to your comments regarding the draft Managed Natural and Prescribed Fire Plan and preliminary Environmental Assessment (EA) dated July 3, 2000.

### **Concern:**

"I generally support your plans for fire management as outlined in the "Ely District Managed Natural and Prescribed Fire Plan". I feel strongly that the No Action Alternative would be a serious mistake and an unacceptable course to follow. There are three areas however, that in my opinion are not adequately covered in the document.

The management of fire (both prescribed and natural) in Wilderness Study Areas (WSAs) and future wilderness areas is not dealt with in any detail except to say that the Interim Management Plant (IMP) regulations will be followed. It is my impression that the IMP regulations don't seriously address the issue of prescribed fire as a tool to make amends for many decades of fire suppression. Also, the issue of seeding and fire rehab in WSAs following natural fire events needs to be spelled out. Issues such as seeding with non-native species following a fire event need to be addressed. The IMP regulations prohibit introduction of non-native species but I believe this has happened in the Table Mountain WSA following the 1997 wildfire event."

### **Response:**

Fire management in wilderness and WSAs has been addressed in greater detail in the wilderness sections of the final Managed Natural and Prescribed Fire Plan (MN&PF Plan) and the Environmental Assessment for Managed Natural Fire and Programmatic Analysis for Prescribed Fire for the Ely District. The process for evaluating fire effects on wilderness sustainability and values has also been addressed in the Standard Operating Procedures (SOPs) in Appendix F of the MN&PF Plan.

BLM guidance for prescribed fire is contained in the Interim Management Policy and Guidelines for Lands Under Wilderness Review (IMP) as well as the Federal Wildland Fire Management Policy and Program Review. The IMP states,

"[t]he BLM will conduct all prescribed fire and suppression activities in accordance with fire management activity plans and subsequent operational plans (prescribed fire and preattack) for all WSAs, using caution to avoid unnecessary impairment of an area's suitability for preservation as wilderness."

Fire rehabilitation is, and has been an optional management practice within WSAs since they were identified through the inventory process. The final MN&PF Plan provides direction to manage fire to minimize the need for rehabilitation activities. There may be a need to rehabilitate portions of some fires where fire intensity would result in conditions which would not fall within acceptable fire management goals. When this occurs, fire rehabilitation activities in damaged areas would be managed in compliance with IMP guidelines, including the seed species selected for application. With regard to reseeding, the IMP states,

“[r]eseeding and planting under emergency conditions will utilize species native to the area and will minimize cross-country use of motorized equipment.”

No non-native species were seeded during rehabilitation of the Table Mountain fire. All species identified in the reclamation plans were native, and certification of seed purity was assured by accredited seed laboratories. Often following fires, species which had not been present, or which had been present in small amounts, will increase in response to the release of space, water, nutrients or light, resulting from a burn.

**Concern:**

“Second issue of importance is the need for post-fire monitoring of recovery processes. This is absolutely essential since it is imperative to know which management techniques are most effective in any given situation. Study plots need to be large enough (minimum of 10 acres/site) and properly matched with control sites such that valid quantitative data can be obtained.”

**Response:**

On page 21, Section VI of the MN&PF Plan, it states that, “[p]ost-fire monitoring will also be conducted to determine if the management objectives of this [MN&PF Plan] are being met.” In the Vegetation Management Section (VI. B.), we give examples of how data will be collected. We would follow USDI-BLM (1996) Sampling Vegetation Attributes - Technical Reference 1734-4.

**Concern:**

“The Table Mountain fire site is a case in point. That fire presented a wonderful opportunity to gather data about the benefits of post-fire seeding and its long-term usefulness in the rehabilitation process. Yet no significant long-term study sites were established and ten years from now we will only have anecdotal material available about the benefits of the seeding effort. Given the amount of money that will be spent in the next 20 years on fire management and post-fire rehab in the Ely District and throughout the Intermountain west it is of the utmost importance to gather good data about the effects of our actions.”

**Response:**

Bureau monitoring procedures are being followed as stated in the Table Mountain Fire Rehabilitation Plan/EA. Consistent with this plan, four transects were established in October 1998. Transect data are being used to evaluate the achievement of the plan objectives. This is according to Bureau policy. The Bureau Emergency Fire Rehabilitation Handbook 1742-1

requires collection of monitoring data and encourages cooperative research.

**Concern:**

“I would strongly recommend that a fulltime botanist be hired to assess and document the results of the various vegetative manipulation schemes which are being proposed to recreate a more Savannah-like landscape such as existed in eastern Nevada prior to 1900. This person needs to be a competent scientist with freedom to conduct research in an independent manner, and to publish the information obtained in peer-reviewed [journals].”

**Response:**

Many BLM specialists have formal academic training in Botany. Our desire to hire a botanist must be considered in context of shifting workloads and budgets. To date, needs for full-time botanical expertise have been less than for competing positions.

**Concern:**

“Lastly, it should be noted that while bristlecone pines are generally a high elevation species there are locations where they are growing in conjunction with and immediately adjacent to pinyon groves. The east side of the Worthington Mountains is a good example where this occurs. Managers need to be aware that species which don't usually co-exist with pinyon-juniper may do so on occasion and that those areas need special considerations in fire management plans.”

**Response:**

Planning for managed natural and prescribed fires will consider the on-the-ground, site-specific conditions as you describe, and will recommend actions appropriate to these circumstances.

If you have additional questions or concerns, please contact Mike Main of my staff at (775) 289-1850.

Sincerely,

[original signed by]

William E. Dunn  
Fire Management Officer

**3 Attachments:**

1. Decision Record/Finding of No Significant Impact
2. Ely District Managed Natural and Prescribed Fire Plan
3. Environmental Assessment for Managed Natural Fires and Programmatic Analysis for Prescribed Fires for the Ely District EA NV-040-00-020

**The Toiyabe Chapter of the Sierra Club**  
**Nevada and Eastern California**  
PO Box 8096, Reno, NV 89507

Gene Kolkman, Manager  
Blm/Ely District  
HC 33 Box 33500  
Ely, NV 89301

Dear Manager Kolkman,

Thank you for extending the deadline for the Sierra Club to comment on the proposed Managed Natural and Prescribed Fire Plan and Environmental Assessment for the Ely District. We strongly support the BLM planning for both prescribed and natural fires on public lands and shifting limited agency resources to pre-fire planning and actions from fighting every fire. The detail in Appendices F and G is impressive as is the decision-making process for managed natural fires described on p. 17. BLM attention to this detailed process should help avoid disasters like that which occurred at Los Alamos this summer. We would hope that planning for implementing the Great Basin Restoration Initiative in Nevada will be that detailed.

We do have some remaining concerns about the documents:

1. Proposed Project: The description of the proposal leaves many questions unanswered: Why is the Ely District proposing to do this burn plan? Why were these 3.4M acres selected for the burn plan? What is "appropriate fire suppression" on the 8.3M acres of the Ely District which are not in the burn area? What are fire management "polygons?" What do you mean that the polygons were based on containment size? Or based on "allowable burned acres to address resource issues/concerns?" And more specific information is needed on the resources in each polygon. Maps would be very helpful.
2. Past Projects: The documents state that there were 274,000 acres of vegetation projects in the Ely District over the last 40 years (4% of the District) and that the projects improved vegetation conditions and species diversity. Where is the data showing the results of past vegetation projects? Data from the Ely District would help support assertions in the documents that the proposed burn plan would "increase native species diversity and productivity" as well as provide the basis for estimating improvements expected from future burns and identifying problems which have resulted from these projects which could be avoided in future burn projects.
3. Insufficient Information on Existing Conditions: There are no actual descriptions of conditions of the vegetation communities described in Appendix B and elsewhere. The seral condition of the areas would indicate whether areas are meeting management objectives, the priority for prescribed burns, as well as existing management problems which need to be corrected. The boiler plate language about vegetation communities used in the document without actual descriptions of existing conditions, the impacts of past management decisions including overgrazing on vegetation conditions, and the needs for management changes, etc. will lead to the use of fire in an expensive, labor, intensive but bandaid approach to correcting past and present management problems. For example, on pp. 11 & 12, vegetation management objectives are listed. Will it not take more than 2 years of rest following burns to achieve most of these

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GREAT BASIN GROUP  
PO Box 8096  
Reno, NV 89507

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RANGE OF LIGHT GROUP  
PO Box 1973  
Mammoth Lakes, CA 93546

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SOUTHERN NEVADA GROUP  
PO Box 19777  
Las Vegas, NV 89119

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percentages? Don't most of the public lands in the Ely District fail to meet these "desired plant communities" percentages? Another example, the description of aspen communities (p.29) fails to mention that livestock overgrazing prevents aspen recruitment and hastens "declining" stands of aspen.

4. Desired Future Conditions: What are they for each polygon or prescribed burn area? How were they set? Are they the same as "recovery objectives" for burned areas or "resource objectives" which must be met before livestock are allowed back into a burned area? (p. 39).

5. Obligate Species: Very little information is given in the documents on obligate species of the vegetation communities which will be burned. Extremely little analysis was done in the EA on the impacts of the burns on the obligate species. Does BLM know what wildlife depends on the vegetation communities in the Ely District? The information should be included in an appendix.

6. Weed Infestation: Very little information is given on weed infestation in the Ely District or how prescribed and natural fires will exacerbate the weed problems. The assumption in the documents appears to be that fires directly lead to "more diverse and healthy vegetation communities." This is certainly not the case on many public lands in the Great Basin, where fires have lead to a vicious cycle of cheatgrass-fire-cheatgrass or invasion of sites by rabbitbrush or exotic plants. The burn plan covers 3.4M acres of the District, plus an unknown area which will be subjected to other types of vegetation "treatments." This is an enormous amount of land which would potentially be disturbed and would then provide excellent habitat for weed infestations. The documents should seriously consider these possible negative impacts.

7. Fencing: There is no information on how the BLM will restrict livestock or wild horses from using the burned areas for "2 years or until resource (recovery?) objectives are met." Will temporary fences be used? What is the cost and who will construct and then move the fences to the next proposed burn site?

8. Restoration: Other than assertions that some native species will revegetate naturally if a seed source is nearby, there is little information on how burned areas will be restored. Will some areas be reseeded? Will native seeds be used? Or will non-native seeds be used?

9. Riparian Areas: There is little information on the condition of riparian areas or analysis of how implementing the burn plans would affect these areas which are of critical importance to most species of wildlife in the Great Basin. BLM has a riparian policy that 75% of the areas would be in fully functioning condition by 1995 - was this goal achieved in the Ely District? Will prescribed and natural fires help achieve this policy or not?

10. Annual Limit to Acres Burned: There appears to be no annual limit to the amount of acres burned in natural or prescribed burns in the Ely District (2,420,219 acres in "few restrictions") including 73.5% of all acres in Wilderness Study Areas. Since each fire requires a lot of BLM resources for monitoring, management, fire containment, etc. and since each fire will destroy habitat for obligate wildlife species, increase erosion, possibly spread weeds, require BLM to deal with the difficulties of prohibiting livestock and wild horse use of the burned areas, etc., the Sierra Club believes it would be prudent to limit the number of prescribed fires to a number and a total acreage (beyond wildfires) which BLM has sufficient resources to handle. This might help also establish an annual reliable demand for native seeds which would stimulate private industry to produce a reliable supply of native seeds for restoration purposes.

11. Vegetation Conversion Projects: There is no information in the documents on how many acres of public lands in the Ely District will be "treated" annually in other vegetation conversion projects, including chaining and herbiciding. What is the cumulative annual total of vegetation conversion projects which the Ely District proposes?

In conclusion, while the Sierra Club supports rational planning for handling natural wildfires and reintroducing prescribed fires into ecosystems whose health is dependent on fire, we are concerned that the burn plan as written proposes to introduce vast disturbances on the public lands in the Ely District without consideration of the cumulative impacts on our natural resources. In addition, we are concerned that the BLM will use fires as bandaid solutions to past and current management problems rather than taking corrective actions with land uses which are creating the unhealthy vegetation conditions which fires are supposed to cure.

Thank you for considering our comments.

Sincerely,

[original signed by]

Rose Strickland, Chair  
Public Lands Committee



# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

Ely Field Office  
HC 33 Box 33500 (702 No. Industrial Way)  
Ely, Nevada 89301-9408  
<http://www.nv.blm.gov/Ely>

In Reply Refer To:  
9211.1 (NV-040)

Toiyabe Chapter of the Sierra Club  
Attn: Rose Strickland  
P.O. Box 8096  
Reno, Nevada 89507

Dear Ms. Strickland:

This letter is in response to your comments regarding the draft Ely District Managed Natural and Prescribed Fire Plan and preliminary Environmental Assessment (EA) dated July 5, 2000.

### Concern:

"We do have some remaining concerns about the documents:

1. Proposed Project: The description of the proposal leaves many questions unanswered: Why is the Ely District proposing to do this burn plan? Why were these 3.4M acres selected for the burn plan? What is "appropriate fire suppression" on the 8.3M acres of the Ely District which are not in the burn area? What are fire management "polygons?" What do you mean that the polygons were based on containment size? Or based on "allowable burned acres to address resource issues/concerns?" And more specific information is needed on the resources in each polygon. Maps would be very helpful."

### Response:

This plan is being proposed for four reasons: 1) to comply with Federal Wildland Fire Management Policy, 2) to implement approved land use plans and activity plans, 3) to allow fire to resume a more natural role in the ecosystem in the Ely District, and 4) White Pine, Lincoln, and Nye counties asked the District for a fire management plan. The areas selected for implementation of managed natural fire (comprising approximately 3.6 million acres) were selected by an interagency/interdisciplinary team using criteria C and D, fire history, past fire behavior, current vegetative condition, other resource issues and socio-political concerns as stated on page two of the MN&PF Plan. Pages 3-12 of the MN&PF Plan discuss potentially affected resources and factors which influenced the team's recommendation to exclude or include areas for managed natural fire.

"Appropriate fire suppression" is addressed in the plan under the term "Appropriate Management Response" in the glossary of the MN&PF Plan. It is defined as:

"Specific actions taken in response to a wildland fire to implement protection and fire use objectives. Examples include: 1) direct attack with hand crews or mechanized equipment; 2) indirect attack, such as using existing roads or geologic features as fire

lines; 3) herding the fire using natural barriers; and/or 4) monitoring the fire and allowing weather conditions and natural barriers to contain the fire perimeter.”

Figure 1, found on page 4 of the MN&PF Plan, shows the locations of fire management polygons. Fire Management Polygon is defined in the glossary of the MN&PF Plan as:

“A geographic area identified for fire management purposes which establishes maximum allowable acres which can be burned in a single fire based on the ability of the plant community to recover following fire, fire history, past fire behavior, socio-political concerns, and other resource issues (i.e., wildlife habitat and cultural resources). It is expected that 75 percent of the time individual managed natural fires will not exceed the allowable burned acres.”

Pages 17-19 of the MN&PF Plan refer to the allowable burned acres within the 35 fire management polygons. The glossary provides a definition of “allowable burned acres.” “Containment size” was removed from the document because it was synonymous with allowable burned acres.

Pages 3-12 of the MN&PF Plan summarize the data used by the interdisciplinary/interagency team in development of the fire management polygon boundaries. Decisions on the resources within the polygons were based upon USDA-Natural Resources Conservation Service (NRCS, formerly Soil Conservation Service) site guides (soils survey and range site descriptions) and various data available at the Ely Field Office. The team used larger scale maps (1:24,000 and 1:100,000) with plotted resource data (page 17 through 19, and Appendix B of the MN&PF Plan) which are available for public review at the Ely Field Office.

**Concern:**

“2. Past Projects: The documents state that there were 274,000 acres of vegetation projects in the Ely District over the last 40 years (4% of the District) and that the projects improved vegetation conditions and species diversity. Where is the data showing the results of past vegetation projects? Data from the Ely District would help support assertions in the documents that the proposed burn plan would “increase native species diversity and productivity” as well as provide the basis for estimating improvements expected from future burns and identifying problems which have resulted from these projects which could be avoided in future burn projects.”

**Response:**

While there is ongoing monitoring (e.g., trend studies, field observations, photo points), compilation of local data showing results of past vegetation projects is limited. Specific data documenting the effects of some past burns in the Ely District are available, for example from the 1997 rehabilitation of the Table Fire. Professional judgement from interdisciplinary/interagency resource specialists is relied upon. The MN&PF Plan provides for monitoring in the future. Appendix B of the MN&PF Plan discusses fire effects by vegetation communities.

**Concern:**

“3. Insufficient Information on Existing Conditions: There are no actual descriptions of conditions of the vegetation communities described in Appendix B and elsewhere. The seral condition of the areas would indicate whether areas are meeting management objectives, the priority for prescribed burns, as well as existing management problems which need to be corrected. The boiler plate language about vegetation communities used in the document without actual descriptions of existing conditions, the impacts of past management decisions including overgrazing on vegetation conditions, and the needs for management changes, etc. will lead to the use of fire in an expensive, labor-intensive but bandaidd approach to correcting past and present management problems. For example, on pp. 11 & 12, vegetation management objectives are listed. Will it not take more than 2 years of rest following burns to achieve most of these percentages? Don't most of the public lands in the Ely District fail to meet these "desired plant communities" percentages? Another example, the description of aspen communities (p.29) fails to mention that livestock overgrazing prevents aspen recruitment and hastens "declining" stands of aspen.”

**Response:**

The Managed Fire Implementation Team (MFIT) will determine if site-specific fire management objectives (pages 13 and 14 in the MN&PF Plan) would be met through implementation of a managed natural fire. In this way actual conditions of a vegetative community will be considered and a more diverse plant community could be attained. Please refer to the following in the MN&PF Plan: page 19, “Decision-making Process;” Appendix G, “Wildland Fire Implementation Plan” and Appendix H, “Prescribed Fire Plan.” The discussion on vegetation communities is not “boiler-plate” and a detailed description of the most common vegetation communities within the plan area is provided in Appendix B of the MN&PF Plan. The need is to re-introduce fire to a more natural ecological role. This would correct increased fuel loading caused by past and present fire suppression practices.

The standard operating procedure in Appendix F of the MN&PF Plan has been changed to address this issue: “The burned area will be rested from livestock grazing until resource management objectives established for each burned area have been met.” “Vegetation Management Objectives” page 13 of the MN&PF Plan refer to long-term desired plant community percentages based on USDA-NRCS (1995) range site descriptions. Upon implementation of the plan the BLM will proceed toward attainment of the vegetative objectives.

**Concern:**

“4. Desired Future Conditions: What are they for each polygon or prescribed burn area? How were they set? Are they the same as "recovery objectives" for burned areas or "resource objectives" which must be met before livestock are allowed back into a burned area? (p. 39).”

**Response:**

Please see response number 3 above concerning desired future conditions and how those conditions were set for each vegetation community. Appendix B of the MN&PF plan gives detail descriptions of the vegetation communities and the desired future conditions. Within each vegetation communities the management goals and objectives are stated on pages 13 and 14 of

the MN&PF plan. Desired future condition and recovery objectives for livestock are not met in the same way. Recovery objectives are based on percentage of desired perennial canopy cover and species diversity set by an interagency/interdisciplinary team which will include public input. Livestock would be allowed to graze a burned area upon meeting these objectives.

**Concern:**

“5. Obligate Species: Very little information is given in the documents on obligate species of the vegetation communities which will be burned. Extremely little analysis was done in the EA on the impacts of the burns on the obligate species. Does BLM know what wildlife depends on the vegetation communities in the Ely District? The information should be included in an appendix.”

**Response:**

In response to comments received through the public review process, both documents now contain revisions addressing obligate species (see Table 2 and 3 of Appendix D in the MN&PF Plan).

**Concern:**

“6. Weed Infestation: Very little information is given on weed infestation in the Ely District or how prescribed and natural fires will exacerbate the weed problems. The assumption in the documents appears to be that fires directly lead to "more diverse and healthy vegetation communities." This is certainly not the case on many public lands in the Great Basin, where fires have lead to a vicious cycle of cheatgrass-fire-cheatgrass or invasion of sites by rabbitbrush or exotic plants. The burn plan covers 3.4M acres of the District, plus an unknown area which will be subjected to other types of vegetation "treatments." This is an enormous amount of land which would potentially be disturbed and would then provide excellent habitat for weed infestations. The documents should seriously consider these possible negative impacts.”

**Response:**

In response to comments received through the public review process, both documents contain revisions addressing weeds. (See Noxious and Invasive Weeds of the MN&PF Plan and pages 9 and 10 of the EA).

**Concern:**

“7. Fencing: There is no information on how the BLM will restrict livestock or wild horses from using the burned areas for "2 years or until resource (recovery?) objectives are met." Will temporary fences be used? What is the cost and who will construct and then move the fences to the next proposed burn site?”

**Response:**

This plan addresses how the BLM proposes to manage fire under natural and prescribed conditions. Management of livestock or wild horses would be addressed on a case-by-case basis, as is the current practice under BLM policy. Livestock use would be restricted through livestock grazing closure agreement with permittees or by full force and effect decision. Wild horse emergency gather procedures would be implemented if necessary. Fencing could be one

alternative used to meet restoration objectives. Emergency fire rehabilitation (EFR) funds would be used for fence material, construction and removal.

**Concern:**

“8. Restoration: Other than assertions that some native species will revegetate naturally if a seed source is nearby, there is little information on how burned areas will be restored. Will some areas be reseeded? Will native seeds be used? Or will non-native seeds be used?”

**Response:**

Selection of the fire management polygons and identification of allowable burned acres thresholds was intended to reduce the need to reseed after managed natural or prescribed fires. If there is an insufficient amount of grasses or forbs within the burned area, rehabilitation measures will be recommended by the fire rehabilitation team. BLM Handbook 1742-1 specifies fire rehabilitation procedures. Generally, native species would be the preferred mix, however availability and to a lesser extent economics may necessitate use of non-native species. Within wilderness and wilderness study areas, “reseeding and planting under emergency conditions will utilize species native to the area...” (Interim Management Policy for Lands Under Wilderness Review). Outside of these special areas, selection of native or non-native plants is based on an assessment of the capabilities of natives to compete and seed availability. Some areas would be reseeded, if satisfactory natural response is deemed unlikely.

**Concern:**

“9. Riparian Areas: There is little information on the condition of riparian areas or analysis of how implementing the burn plans would affect these areas which are of critical importance to most species of wildlife in the Great Basin. BLM has a riparian policy that 75% of the areas would be in fully functioning condition by 1995 -was this goal achieved in the Ely District? Will prescribed and natural fires help achieve this policy or not?”

**Response:**

In response to comments received through the public review process, both documents contain revisions addressing riparian areas. Please refer to Riparian Areas/Wetlands Sections on pages 10 and 7 in the EA and MN&PF Plan, respectively.

The 1995 proper functioning condition (PFC) goals have not yet been achieved. The MN&PF Plan will help achieve this goal.

**Concern:**

“10. Annual Limit to Acres Burned: There appears to be no annual limit to the amount of acres burned in natural or prescribed burns in the Ely District (2,420,219 acres in "few restrictions") including 73.5% of all acres in Wilderness Study Areas. Since each fire requires a lot of BLM resources for monitoring, management, fire-containment, etc. and since each fire will destroy habitat for obligate wildlife species, increase erosion, possibly spread weeds, require BLM to deal with the difficulties of prohibiting livestock and wild horse use of the burned areas, etc., the Sierra Club believes it would be prudent to limit the number of prescribed fires to a number and a total acreage (beyond wildfires) which BLM has sufficient resources to handle. This might help also establish an annual reliable demand for native seeds

which would stimulate private industry to produce a reliable supply of native seeds for restoration purposes.”

**Response:**

There is no annual limit of total acres for natural or prescribed fires, but the long-term goal is to treat 1,250,000 acres over the life of the plan. In 1997 White Pine, Nye, and Lincoln Counties established a Coordinated Resource Management (CRM) steering committee which formed a technical review team (TRT) to prepare a fire management plan for the District. The TRT decided an acreage size would be arbitrary. The TRT decided an interdisciplinary team would evaluate the number and size of fires within a given fire management polygon during and post fire season. Recommendation based on resource objectives being achieved would determine if a portion or all of a fire management polygon is placed into a more restricted fire management response. The interdisciplinary team would also look at management objectives (page 13 of the MN&PF plan) for each vegetation community to insure desired fuel reduction for each plant community is being achieved.

The Decision-Making Process in the MN&PF plan page 19 explains the process in determining if a fire will be managed as a natural fire. The decision-making process will evaluate the fire's potential based on current fire behavior, intensity, and expected growth. It will also consider national preparedness level, current district fire activity, local resource availability, and forecast weather trends.

Since these polygons have had extensive review and adjustments, for the past four years, from the public, scientists, wildlife agencies, local and state government, and other groups, it is felt that the MN&PF plan would improve habitat for wildlife species, reduce the potential for erosion, and limit the spread of noxious weeds. Implementation of the proposed plan would enhance vegetative conditions, species and stand diversity, watershed quality, and wildlife habitat etc. Obligate and dependent species would benefit from healthier vegetative communities and the potential to create future habitat for species in the long-term.

As stated in the MN&PF plan, some of the benefits of managed natural fires is the improved public and firefighter safety, reduced suppression costs and reduce the acres requiring rehabilitation. Accumulations of fuel loading from suppressing fires for the past fifty years has increased the risks. This plan will start to reduce these risks for the future in the Ely District. Without the implementation of the MN&PF plan a continuation of fuel loading will occur. We can expect the current trend toward larger and hotter fires to continue (Table 1 of the Programmatic Environmental Assessment for the Ely District Managed Natural and Prescribed Fire Plan).

**Concern:**

“11. Vegetation Conversion Projects: There is no information in the documents on how many acres of public lands in the Ely District will be "treated" annually in other vegetation conversion projects, including chaining and herbiciding. What is the cumulative annual total of vegetation conversion projects which the Ely District proposes? “

**Response:**

As analyzed in the cumulative impacts section of the EA, 100,000 acres are proposed to be treated annually. Presently there are no plans to use herbicide applications.

If you have additional questions or concerns, please contact Mike Main of my staff at (775) 289-1850.

Sincerely,

[original signed by]

William E. Dunn  
Fire Management Officer

3 Attachments:

1. Decision Record/Finding of No Significant Impact
2. Ely District Managed Natural and Prescribed Fire Plan

### 3. Environmental Assessment for Managed Natural Fires and Programmatic Analysis for Prescribed Fires for the Ely District EA NV-040-00-020